

Exhibit 46

(REDACTED)

This Exhibit contains the specific pages of the deposition Plaintiffs are referencing. The entire deposition was separately filed in the record pursuant to LR 5.1 and the M.D. Ga. CM/ECF Administrative Procedures Manual.

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION

WILHEN HILL BARRIENTOS,)
ET AL.,)
)
Plaintiffs,)
) CIVIL ACTION FILE
vs.)
) NO: 4:18-CV-00070-CDL
CORECIVIC, INC.,)
)
Defendant.)

DEPOSITION OF HARRELL GRAY

ATLANTA, GEORGIA

WEDNESDAY, OCTOBER 27, 2021

(Reported Remotely)

REPORTED BY: TANYA L. VERHOVEN-PAGE,
CCR-B-1790

FILE NO. 201273

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October 27, 2021

9:31 a.m.

Deposition of
HARRELL GRAY, held in Atlanta,
Georgia before Tanya L. Verhoven-Page,
Certified Court Reporter and Notary Public
of the State of Georgia.

APPEARANCES OF COUNSEL

On behalf of the Plaintiffs:

PERKINS COIE
1155 Avenue of the Americas

New York, New York 10036

BY: ALAN HOWARD, ESQ.

SOUTHERN POVERTY LAW CENTER
400 Washington Avenue
Montgomery, Alabama 36104

BY: MEREDITH STEWART, ESQ.

BY: NORMA VENTURA, ESQ.

BY: JACKIE OSORNO, ESQ.

On behalf of the Defendant:

Struck Love Bojanowski & Acedo, PLC
3100 West Ray Road

Chandler, Arizona 85226

BY: JACOB LEE, ESQ.

- - -

1 H. GRAY

2 Q Was that facility also run by CoreCivic?

3 A Yes.

4 Q And then after that, where did you go?

5 A I went to T. Don Hutto in Taylor, Texas.

6 Q How long were you at Hutto.

7 A Around two years, maybe. Two years, give
8 or take.

9 Q Is Hutto an immigrant detention facility?

10 A Yes.

11 Q And what was your job at Hutto?

12 A Assistant warden.

13 Q Okay. And then where did you go?

14 A To the Marietta Justice Center at St.
15 Mary's, Kentucky.

16 Q And what was your job there?

17 A Assistant warden.

18 Q When did you leave the Kentucky facility?

19 A Maybe around 2016, something like that.

20 2014, 2016, I'm not sure.

21 Q Where did you go after that?

22 A To the Stewart Detention Center.

23 Q Okay. So you started at Stewart in 2014?

24 A Yes.

25 Q Do you remember around what month?

1 H. GRAY

2 A Maybe September.

3 Q And what was your position when you
4 started at Stewart Detention Center in 2014?

5 A Assistant warden.

6 Q How long were you at Stewart?

7 A Until 28 months ago. I've been at this
8 facility 28 months. I've been at this facility 28
9 months. Backtrack 28 months ago.

10 Q So you were at Stewart until roughly
11 2019?

12 A Approximately, yes.

13 Q Were you an assistant warden the entire
14 time you were there?

15 A Yes.

16 Q And counsel for your current employer,
17 CoreCivic, is representing you in this deposition
18 today, correct?

19 A Yes.

20 Q Do you have any family members that work
21 or worked for CoreCivic?

22 A Yes.

23 Q Okay. Who?

24 A My wife.

25 Q What facility does your wife work at?

1 H. GRAY

2 Q Do you know if it was merit based?

3 MR. LEE: Object to form and
4 foundation.

5 BY MS. STEWART:

6 Q Do you know what I mean by merit based?

7 A Yes, I do, but I don't know if it was.

8 Q And you have no idea why you received the
9 yearly bonus?

10 MR. LEE: Foundation.

11 THE WITNESS: No.

12 BY MS. STEWART:

13 Q Is AW a common abbreviation of assistant
14 warden?

15 A Yes.

16 Q And now just talking about your time as
17 assistant warden at Stewart Detention Center, what
18 were your duties and responsibilities?

19 A I was responsible for the maintenance
20 supervisor, the fire and safety personnel, the
21 chaplain, the learning and development manager and
22 the contract food service director.

23 Q Okay. So in that list, you said
24 maintenance, chaplain, the contract of the food
25 service director.

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H. GRAY

25

During your time employed at Stewart,

H. GRAY

A horizontal bar chart consisting of 20 black bars of varying lengths. The bars are arranged vertically, one above the other. The lengths of the bars represent a distribution of data, with the longest bar reaching approximately 100% of the chart's width and the shortest bar reaching approximately 10%. The bars are arranged in a single column, with no labels or axes visible.

1 H. GRAY

2 assistant warden at Stewart you were over the
3 maintenance supervisors?

4 A Yes.

5 Q Did the maintenance department utilize
6 detained workers in the work program?

7 A My last year -- my last year over at
8 Stewart, they started using maintenance workers.

9 Q Was that in 2019?

10 A Yes.

11 Q And what did they use the detained
12 workers for?

13 A To assist the maintenance, the actual
14 CoreCivic workers, with daily tasks around the
15 facilities.

16 Q What type of tasks would they perform?

17 A Work orders, mainly work orders. Change
18 light bulbs, fix toilets, maybe other additional
19 roles.

20 Q And during that time, who would the
21 detained workers report to?

22 A They would report to the maintenance
23 supervisor. Then he would dispatch them to certain
24 individuals he had working in his department.

25 Q And who was the maintenance supervisor at

1 H. GRAY

2 files it in a particular file.

3 Q Is it a handwritten form?

4 A Yes, handwritten, yes.

5 Q And does anyone review the meal
6 monitoring forms?

7 A Yes.

8 Q Would reviews them?

9 A I review them.

10 Q So when it was someone else's shift on
11 the ADO team to fill out the form, you were the
12 person in charge of reviewing that form?

13 A I wasn't in charge, but I reviewed it. I
14 wasn't in charge of the reviewing it, but I did
15 review them.

16 Q Was there anyone who was actually in
17 charge of reviewing them?

18 A No.

19 Q And how often did you review them?

20 A Daily. I reviewed the shift supervisor
21 forms ones daily.

22 Q Did you review the warden's ones daily?

23 A He didn't do it daily. He did it -- once
24 his ADO rotation was, he did a breakfast, a lunch and
25 a dinner meal.

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H. GRAY

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H. GRAY

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H. GRAY

[illegible]

24 the next document I want to show you is CCBVA 232829.

25 And this will be marked as Exhibit 26.

C E R T I F I C A T E


STATE OF GEORGIA:

FULTON COUNTY:

I hereby certify that the foregoing deposition was reported, as stated in the caption, and the questions and answers thereto were reduced to written page under my direction, that the preceding pages represent a true and correct transcript of the evidence given by said witness.

I further certify that I am not of kin or counsel to the parties in the case, am not in the regular employ of counsel for any of said parties, nor am I in any way financially interested in the result of said case.

Dated this 10th day of November,
2021.



Tanya L. Verhoven-Page,
Certified Court Reporter,
B-1790.